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Via Electronic Filing

Jocelyn Boyd, Chief Clerk
SC Public Service Commission
Post Office Drawer 11649
Columbia SC 29211

RE: Docket Nos. 2019-184-E; 2019-185-E; and 2019-186-E
Questions for Potential Commission Qualified Independent
Third Party Experts

Dear Ms. Boyd:

Pursuant to the Commission request at the August 7, 2019 Commission hearing in regards to the above Dockets, the South Carolina Solar Business Alliance, Inc. ("SCSBA") hereby submits the following questions for Commission consideration in the Commission's interviewing of candidates to serve as the Commission's qualified independent third party expert under S.C. Code Ann. 58-41-20(I). The SCSBA questions are as follows:

Qualifications

1. Please describe your experience and expertise, if any, in the following topics:
 - a. Calculation of avoided cost values
 - i. What methodologies have you used for the calculation of avoided cost? (e.g. Peaker, Differential Revenue Requirements, or Proxy Method.)
 - ii. Are you familiar with other utilities' approaches to calculating avoided cost values under PURPA? If so, what utilities in what states?
 - b. Have you ever conducted an independent calculation of a utility's avoided energy and capacity costs? If so, what method(s) did you use to do that?
 - c. Production cost modeling
 - i. What model(s) have you used?
 - d. Utility rate design

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- e. Fuel cost forecasting
 - f. Resource planning and evaluation
 - g. Integration costs for renewable resources or other forms of generation
 - h. PURPA implementation
 - i. LEO standards
 - ii. Contract term issues
 - iii. PURPA reform efforts
 - i. Transmission planning
 - j. Seasonal capacity allocation
 - k. Energy storage
 - l. Ancillary services
 - m. "Value of Solar"
 - n. The financing of energy projects
2. Have you ever provided testimony on any of the above, or related topics, to a utilities commission, or to FERC? If so, which ones?
 3. What other individuals, if any, would you plan to engage if you were awarded a contract for this work?
 - a. Please describe their qualifications.
 4. To what extent has your work focused on traditionally-regulated markets versus deregulated markets?

Independence

1. Have you or your company ever performed work for any of the following entities, or their predecessors, affiliates, or related entities?
 - i. Duke Energy Progress, LLC (successor to Progress Energy)
 - ii. Duke Energy Carolinas, LLC
 - iii. Duke Energy
 - iv. Dominion Energy South Carolina, Inc. (successor to SCANA/SCE&G)
 - v. Dominion Energy
 - vi. South Carolina Solar Business Alliance, Inc.
 - vii. Johnson Development Associates, Inc.
 - viii. South Carolina Coastal Conservation League
 - b. If so, please describe (a) the nature of the work, (b) when it was performed, and (c) the approximate amount of revenue received by you or your company for that work.
2. Have you ever presented testimony or assisted in the preparation of testimony, briefs, or other filings for any other party, in support of the position taken by any of the above-referenced parties or their predecessors, affiliates, or related entities?
3. Please describe any and all work you or your company have conducted in the state of South Carolina.
4. Approximately what percentage of the revenues from your company come from work performed for

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- a. Investor-owned utilities
 - b. Municipal utilities or cooperatives
 - c. State public service commissions
 - d. Other governmental entities
 - e. Trade associations or non-profit entities
 - f. Energy project developers
 - g. Other clients
5. Have you, or any of the officers or directors of your company, been directly employed by an investor-owned utility?

Please let me know if we may be of further assistance in this regard.

Very best regards,

s/Weston Adams, III

Weston Adams, III

cc: Joseph Melchers, Esq. (via email and electronic service)
All Parties of Record (via email and electronic service)